



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2023 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ROBERTO COVARRUBIA RAMOS,  
  
Defendant.

ED CR No. 5:24-cr-00042-KK

I N D I C T M E N T

[21 U.S.C. §§ 841(a)(1),  
(b)(1)(B)(viii): Possession with  
Intent to Distribute  
Methamphetamine; 18 U.S.C.  
§ 924(c)(1)(A)(i): Carrying a  
Firearm During and in Relation to,  
and Possessing a Firearm in  
Furtherance of, a Drug Trafficking  
Crime; 18 U.S.C. § 922(g)(1):  
Felon in Possession of a Firearm  
and Ammunition; 21 U.S.C. § 853,  
18 U.S.C. § 924, and 28 U.S.C.  
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about December 9, 2022, in San Bernardino County, within  
the Central District of California, defendant ROBERTO COVARRUBIA  
RAMOS knowingly and intentionally possessed with intent to distribute  
at least 50 grams, that is, approximately 323.96 grams, of a mixture

1 and substance containing a detectable amount of methamphetamine, a  
2 Schedule II controlled substance.

COUNT TWO

[18 U.S.C. § 924(c) (1) (A) (i)]

On or about December 9, 2022, in San Bernardino County, within the Central District of California, defendant ROBERTO COVARRUBIA RAMOS knowingly carried a firearm, namely, a Beretta, model APX, 9mm caliber semi-automatic pistol, bearing serial number A045053X, during and in relation to, and possessed such firearm in furtherance of, a drug trafficking crime, namely, Possession with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Sections 841(a) (1), (b) (1) (B) (viii), as charged in Count One of this Indictment.

COUNT THREE

[18 U.S.C. § 922(g)(1)]

On or about December 9, 2022, in San Bernardino County, within the Central District of California, defendant ROBERTO COVARRUBIA RAMOS knowingly possessed the following firearm and ammunition, each in and affecting interstate and foreign commerce:

1. a Beretta APX, 9mm caliber semi-automatic pistol, bearing serial number A045053X;

2. five rounds of Cascade Cartridge Inc. 9mm Luger caliber ammunition;

3. four rounds of Winchester 9mm Luger caliber ammunition;

4. two rounds of Federal Cartridge Company 9mm Luger caliber ammunition;

5. one round of Fiocchi 9mm Luger caliber ammunition; and

6. one round of Remington Peters 9mm Luger caliber ammunition.

Defendant RAMOS possessed such firearm and ammunition knowing that he had previously been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

1. Transportation or Sale of a Controlled Substance, in violation of California Health and Safety Code Section 11352(a), in the Superior Court for the State of California, County of San Bernardino, case number FSB705264, on or about March 3, 2008;

2. Assault with a Deadly Weapon Other Than a Firearm, in violation of California Penal Code Section 245(a)(1), in the Superior Court for the State of California, County of San Bernardino, case number FSB1002994, on or about November 17, 2010;

1           3.     Vehicle Theft, in violation of California Vehicle Code  
2 Section 10851(a), in the Superior Court for the State of California,  
3 County of San Bernardino, case number FSB1302271, on or about July 2,  
4 2013;

5           4.     Shooting at an Inhabited Dwelling or Occupied Vehicle, in  
6 violation of California Penal Code Section 246, in the Superior Court  
7 for the State of California, County of San Bernardino, case number  
8 FSB1405263, on or about January 23, 2015; and

9           5.     Evading a Peace Officer with Wanton Disregard for Safety,  
10 in violation of California Vehicle Code Section 2800.2(a), in the  
11 Superior Court for the State of California, County of San Bernardino,  
12 case number FSB17004781, on or about April 2, 2019.

FORFEITURE ALLEGATION

[21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offenses set forth in any of Counts One through Three of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from any such offense;

(b) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense;

(c) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and

(d) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), and (c).

3. Pursuant to Title 21, United States Code, Section 853(p), the defendant, if so convicted, shall forfeit substitute property if, by any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred,

1 sold to, or deposited with a third party; (c) has been placed beyond  
2 the jurisdiction of the court; (d) has been substantially diminished  
3 in value; or (e) has been commingled with other property that cannot  
4 be divided without difficulty.

5 A TRUE BILL

6  
7 /S/  
8 Foreperson

9 E. MARTIN ESTRADA  
10 United States Attorney

11 MACK E. JENKINS  
12 Assistant United States Attorney  
13 Chief, Criminal Division

14 *Christina Shy for SMG*

15 SCOTT M. GARRINGER  
16 Assistant United States Attorney  
17 Deputy Chief, Criminal Division

18 BENEDETTO L. BALDING  
19 Assistant United States Attorney  
20 Deputy Chief, General Crimes  
21 Section

22 SARAH S. LEE  
23 Assistant United States Attorney  
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